

EXHIBIT 40

RESPONSE TO OMNIBUS OBJECTION

I. CONTACT INFORMATION

Name: *Arleen J. Nieves Correa*

Mailing Address *Urb. Jardines de Gurabo #148*
Calle 6 Gurabo P.R. 00778-2730

Contact Home Phone: _____ Cell 787-373-0297

Claim Number: 176804

II. Caption 178210

A. Clerk's Office

United States District Court
Room 150 Federal Building
San Juan Puerto Rico 00918-1767

B. Commonwealth of Puerto Rico et al. (Debtors)

C. Case Number: 17 BK 3283 – LTS

D. Omnibus Objection regarding requests for amounts not paid by the Commonwealth of Puerto Rico:

Proof of claim numbers:

#49762 – Act 89 – *Romerazo* – Effective July 1, 1995

#94057 –June 6, 2008 Pay Scale Act – Step Increases

#96621 – Act 96 (2002) of Dr. Pedro Rosello – effective July 2002

Act 164 (2004) of Ms. Sila Calderón – effective January 2004

III. The court should not grant the Omnibus Objection, because these amounts are owed based on the following laws passed by the government of the Commonwealth of Puerto Rico:

Act 89 *Romerazo* – Effective July 1, 1995

June 6, 2008 Pay Scale Act – Step Increases

Act 96 (2002) of Dr. Pedro Rosello – effective July 2002

Act 164 (2004) of Ms. Sila M. Calderón, effective January 2004

IV. Supporting Documentation

Enclosed are documents demonstrating years of service with the Puerto Rico Telephone Company, ~~Ponce~~ Caguas, Puerto Rico, from the 16th of December of 1985 through the 13th of February of 2012.

I ended my career as a Frame Worker - Caguas

at the Puerto Rico Telephone Company, ~~Ponce~~, Puerto Rico, Commonwealth. Claim is made under the applicable laws that cover these years of ~~educational~~ service.

Enclosed are documents as evidence for this claim.

Due to the recent emergency situation in Puerto Rico brought on by earthquakes and COVID-19, the responses are being sent on today's date. Please contact me should any additional information or documents be needed.

ARLEEN J. NIEVES CORREA

Printed name

[signature]

Signature

PS: The basis of my claims is money that is owed for pay raises under laws that were enacted during the years that the Puerto Rico Telephone Company was an agency of the Commonwealth of P.R.



PRT/CLARO
P.O. Box 360998
San Juan PR 00936-0998

CERTIFICATION

ARLEEN J. NIEVES CORREA
XXX-XX-0198

For the abovenamed former employee, we certify the following:

- She joined PRT/Claro effective 12/16/1985.
- She worked as a regular employee until 02/13/2012.

This certification confirms that the information was obtained from our personnel information system. In Guaynabo, Puerto Rico, on Thursday, September 10, 2020.

Abigail Alejandro González

Abigail Alejandro González
Compensation Officer
Compensation and Records



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TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **ECF 22358**

Signed this 18th of January 2023



Verify at www.atanet.org/verify

A handwritten signature in blue ink, appearing to read "Andreea I. Boscor". A blue line extends from the left side of the signature towards the left edge of the page.

Andreea I. Boscor

